

AGNIFILO INTRATER

July 3, 2024

Via E-Mail

The Honorable Katharine Hayden
United States District Judge
Martin Luther King Building
50 Walnut Street Room 4015
Newark, New Jersey 07101

Re: United States v. Lisa Curty, 20-CR-00817 (KSH)

Dear Judge Hayden:

We represent Lisa Curty in the above-captioned case and write to respectfully request that Ms. Curty serve the remainder of her sentence on home confinement.

As the Court may recall, on December 18, 2023, Ms. Curty was sentenced to a year and a day in prison following her conviction for attempt and conspiracy to commit mail fraud. Two months later, on February 26th, 2024, she reported to FMC Carswell, which was the only Bureau of Prisons (“BOP”) facility which could accommodate treatment and management of her LADA Diabetes.

Unfortunately, despite repeated assurances from BOP prior to her surrendering, Ms. Curty faced significant medical issues throughout her four months at FMC Carswell. For instance, as the Court is aware, she did not receive treatment for her diabetes for the first eleven weeks, resulting in her A1C now measuring 6.8, compared to a normal range of up to 5.7. She received inconsistent insulin at issue at FMC Carswell, and now her eyesight is suffering from it.

Last week, Ms. Curty was transferred to RRM Philadelphia, the halfway house in Newark. This facility has also not been successful in managing her diabetes. For example, the facility has not given pre-lunch insulin most days, which results in her glucose skyrocketing. Despite filing paperwork asking for this to be corrected, her insulin delivery has remained inconsistent.¹ She also has limited ability to exercise at the halfway house, which is critical for Ms. Curty’s glucose management (her outside time is limited to 15-30 minutes per day).

Additionally, since being incarcerated, Ms. Curty’s children have suffered, Ms. Curty autistic son developed tics, while her 8-year-old daughter gained 15 pounds.

Finally, requesting that Ms. Curty serve the remainder of her sentence on home confinement is consistent with the other sentences in this case. For example, Ms. Nichols and Ms. Zaretsky, whom Ms. Curty cooperated *against* and caused significant higher loss amounts (\$30 million compared to \$8 million) and are both serving the remainder of their sentences on home

¹ We can submit Ms. Curty’s contemporary complaints for insulin to BOP if the Court requests it.

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confinement after serving five months of incarceration at a camp. (*See U.S. v. Nichols, et al.*, 6/28/24 Order.)

Accordingly, we respectfully request the Court to allow Ms. Curty to serve the remainder of her sentence on home confinement. The Government does not oppose this request. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marc Agnifilo', with a stylized, cursive script.

Marc Agnifilo

cc : Jordann Conaboy (via email)